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9 *Attorneys for Defendants GORDON CLARK,*
10 *RODNEY KOCH, CINDY LOU ELLEN KOCH,*
11 *and KRYSTAL LEE CLARK*

8 **IN THE UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 LUCKY LAKE FARM & WATER LIMITED
11 PARTNERSHIP, a Saskatchewan Limited
12 Partnership; and SWIFT RIVER FARMS
13 LTD., an Alberta corporation;

13 Plaintiffs,

14 vs.

15 GORDON CLARK, an individual; RODNEY
16 KOCH A/K/A GORDON CLARK, an
17 individual; CINDY LOU ELLEN KOCH, an
18 individual; KRYSTAL LEE CLARK, an
19 individual; MICHAEL ROSE, an individual;
20 MICHAEL ROSE & ASSOCIATES
21 STRATEGIC CONSULTING INC., a Nova
22 Scotia corporation; JEFF HOUGHTON, an
23 individual; TW INTERNATIONAL
24 INVESTMENTS LTD., a Bahamian
25 Registered company; TW ADVISORS LTD.,
26 a British Virgin Islands registered company;
27 TW FUNDS INC., a British Virgin Islands
28 registered company; LA BELLA VITA
29 EQUESTRIANS LLC, a Nevada limited liability
30 company; LA BELLA VITA
INTERNATIONAL EQUINE SALES LLC, a
Nevada limited-liability company; LIQUID
LUXURY GROUP LLC, a Nevada limited
liability company; BLACKSTONE LUXURY
GROUP LLC, a Nevada limited liability
company; DOES I-XX, inclusive; and ROE
CORPORATIONS, I-X, inclusive,

Defendants.

Case No.: 2:23-cv-01768-GMN-VCF

STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME FOR
DEFENDANTS GORDON CLARK,
RODNEY KOCH, CINDY LOU ELLEN
KOCH, AND KRYSTAL LEE CLARK
TO FILE ANSWER TO FIRST
AMENDED COMPLAINT

(Second Request)

1 Plaintiffs and Defendants Gordon Clark, Rodney Koch, Cindy Lou Koch, and Krystal
2 Lee Clark, by and through their respective counsel, hereby stipulate and agree to an Order to
3 extend the deadline for Defendants Gordon Clark, Rodney Koch, Cindy Lou Koch, and Krystal
4 Lee Clark to file their responsive pleading to Plaintiffs' First Amended Complaint (ECF 30) from
5 January 9, 2024 to February 9, 2024. This is the second request for such an extension, and it is
6 made as follows:

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8 1. On December 5, 2023, Plaintiffs filed their First Amended Complaint (ECF 30).
9 The deadline for Defendants Gordon Clark, Rodney Koch, Cindy Lou Koch, and Krystal Lee
10 Clark to respond is December 19, 2023.

11 2. On December 20, 2023, the Court entered an Order extending the time for
12 Defendants Gordon Clark, Rodney Koch, Cindy Lou Koch, and Krystal Lee Clark to file their
13 responsive pleading to Plaintiffs' First Amended Complaint (ECF 30) from December 19, 2023
14 to January 9, 2024 (ECF 35).

15 3. The parties are engaged in settlement discussions and therefore agree to this brief
16 extension. This request is made in good faith and for good cause and not for any purpose of
17 delay or harm.
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1 NOW THEREFORE, the Parties hereby stipulate to the entry of an order extending the
2 deadline for Defendants Gordon Clark, Rodney Koch, Cindy Lou Koch, and Krystal Lee Clark
3 to file their responsive pleading to Plaintiffs' First Amended Complaint (ECF 30) from January
4 9, 2024 to February 9, 2024.

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6 Dated this 9th day of January, 2024.

7 **ALDRICH LAW FIRM, LTD.**

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17 *KOCH, and KRYSTAL LEE CLARK*

Dated this 9th day of January, 2024.

FLYNN GIUDICI, PLLC

/s/ Shamus S. Flynn
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ORDER

IT IS SO ORDERED.

Date: 1-11-2024


UNITED STATES MAGISTRATE JUDGE